CP&L
Carolina Power & Light Company
P. O. Box 101, New Hill, N. C. 27562

December 17, 1982

Mr. James P. O'Reilly
United States Nuclear Regulatory Commission
Region II
101 Marietta Street, Northwest (Suite 3100)
Atlanta, Georgia 30303

NRC-21

Dear Mr. O'Reilly:

In reference to your letter of September 22, 1982 and a November 5, 1982 telephone conversation between Mr. A. K. Hardin and me, referring to RII: GFM 50-401/82-24, attached is Carolina Power and Light Company's supplementary response relative to additional sampling and inspection.

It is considered that the corrective and preventive actions taken are satisfactory for resolution of the item.

Thank you for consideration in this matter.

Yours very truly,

R. M. Parsons

R. M. Parsons
Project General Manager
Shearon Harris Nuclear Power Plant

RMP/sh

Attachment

cc: Mr. P. Kadambi (NRC)
Mr. G. F. Maxwell (NRC-SHNPP)

Attachment to CP&L Letter of Supplementary Response to NRC Report RII: GFM 50-401/82-24

Reported Violation:

10 CFR 50, Appendix B, Criterion XV as implemented by PSAR section 1.8.5.15, CP&L's Corporate QA Program section 5 and construction procedure CQC-2 require that nonconforming conditions be identified and corrected.

Contrary to the above, on June 30, 1982, two field welds on class IE electrical cable tray supports, that had been previously inspected by CP&L QC, were found to be nonconforming, and had not been documented as such, or corrected; in that one of the field welded joints on hanger item identified as 143G10, located in the reactor auxiliary building at elevation 261', was found to be undersized, and also at the same elevation, a fillet weld on hanger number ED2622 was found to be undersized. See the report details for further information on this matter.

Denial or Admission and Reason for the Violation:

The violation is correct as stated. The inspector who performed the inspection is no longer with CP&L. To provide a reason as to why the welds were deficient would only be theory; however, it is assumed that he inadvertently overlooked the two welds referenced in the violation.

Corrective Steps Taken and Results Achieved:

The defects identified by the NRC Inspector were reported in Deficiency and Disposition Report (DDR) Number 995 for control and corrective action. Engineering evaluation concluded that neither of the defects would have presented a significant nuclear safety deficiency if left "as-is"; however, CP&L had the welds reworked to meet drawing requirements.

During an evaluation of the work of the inspector in question, eleven additional supports were reinspected. This reinspection identified three minor weld deficiencies (undersize fillets, base metal undercut) which were reported in DDR-1062 for control and corrective action. Engineering evaluation concluded that the defects could be left "as-is"; however, CP&L again had the welds reworked to meet drawing requirements.

The performance of the inspector in question was evaluated in accordance with site procedure AP-IX-08, Evaluating Inspector or Vendor Weld Visual Inspection Performance on Welded Structural Fabrications. The evaluation concluded that the inspector's performance met the acceptance criteria of the procedure.

Corrective Action Taken to Avoid Further Noncompliance:

1. New inspector candidates undergo extensive on-the-job training with qualified inspectors and must pass written and oral examinations prior to certification. Each is interviewed by the subunit supervisor to ensure awareness of project requirements pertinent to his assignment.

Attachment (cont'd.)

2. The work of each new inspector is audited weekly for the first four (4) weeks to ensure inspections are being performed accurately and in accordance with approved procedures.

3. The work of each inspector is audited on a monthly basis by supervision.

Date When Full Compliance Will Be Achieved:

Full compliance was achieved on December 13, 1982.